

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of the Commission's Rules)
Concerning Maritime Communications)

PR Docket No. 92-257

To: The Commission

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COMMENTS

Fred Daniel d/b/a Orion Telecom (Orion), by its attorneys, hereby files its Comments in the above captioned rule making proceeding. In support of its position, Orion shows the following.

Orion is one of the two licensees of an Automated Maritime Telecommunications System (AMTS) along the Pacific Coast of the United States. Orion is currently an applicant for authority to operate AMTS facilities along the Atlantic Coast and in the State of Hawaii. Therefore, the rule amendments proposed in the instant proceeding would vitally affect Orion's service to the maritime public.

There is much to be said in praise of the Commission's proposals in the instant proceeding. However, since only one of the proposed rule amendments would directly affect Orion, Orion will limit its comments to the matter of immediate importance to it.

For the reasons explained herein, Orion respectfully requests that the Commission clearly exclude AMTS stations and equipment from the proposed requirements relating to Digital

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Selective Calling (DSC). While DSC signalling can readily be added to existing manually operated radio systems and equipment, mandatory inclusion of DSC in AMTS equipment would neither be necessary nor in the public interest.

Proposed Rule 80.203 would require that "All marine MF, HF, and VHF transmitters manufactured in or imported into the United States after February 1, 1997, or marketed or installed on U.S. ships or [sic] after February 1, 1999, must provide for a minimum DSC requirement in accordance with CCIR Recommendation 493 and 541." (emphasis added) However, the word "all" with which the proposed rule begins would appear to be overly broad. To avoid unnecessary burdens for marine radio users, Orion respectfully suggests that the proposed rule be narrowed to include only radios which operate on the frequencies designated for DSC operation by Rule Section 80.1077, 47 C.F.R. §80.1077.

The spectrum allocated to AMTS is within the Very High Frequency band of 30 to 300 MHz. However, the term "VHF Marine band" customarily refers to the 156-162 band, and not to the band 216-220 MHz which is allocated to AMTS. To avoid an inadvertent confusion between the bands 156-162 MHz and 216-220 MHz by an overly broad use of the term "VHF", a minor revision should be made in one of the rules proposed by the Commission.

Although proposed rule 80.203 would require the inclusion of DSC capability for "all VHF transmitters," the only VHF channel which the Commission has designated for DSC is Channel 70, 156.525 MHz. In its Report and Order in PR Docket No. 90-480, 7 FCC Rcd. 951

(1992), the Commission decided to require the monitoring of Channel 70 with a dedicated, non-scanning receiver, further demonstrating the dedication of that channel to DSC operation. Since equipment designed for AMTS use does not operate on Channel 70, there is no need for the Commission to require AMTS transmitters to include DSC capability.

Orion's AMTS system is designed so that a subscribing mobile unit can be reached by dialing a telephone number. The telephone number terminates at Orion's switch. Communication between the mobile unit and Orion's switch is accomplished by use of a proprietary signalling system and contact is established on one of the trunked channels assigned to the system. Orion's switch is fully capable of performing all of the signalling required to create a fully functioning automated maritime telecommunications system. Since mobile units associated with Orion's system are limited to contact with Orion's switch, any requirement for the use of the DSC protocol suggested by the United States Coast Guard would be redundant; it would not facilitate any better communication than is already provided by Orion's AMTS system and equipment.

To avoid placing an unnecessary burden on AMTS users, Orion respectfully requests that proposed Rule Section 80.203 be revised to state that "All marine MF, HF, and VHF transmitters which operate on frequencies designated for DSC by §80.1077 and which are manufactured in or imported into the United States after February 1, 1997, or marketed or installed on U.S. ships on or after February 1, 1999, must provide for a minimum DSC requirement in accordance with CCIR Recommendation 493 and 541 as modified by the table

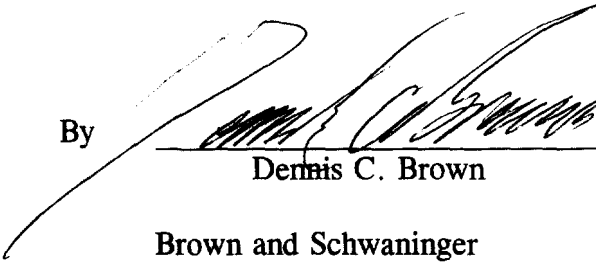
below. The following table lists the required minimum DSC capabilities for each class of DSC equipment:". (The suggested addition is underlined, above.)

Conclusion

For all the foregoing reasons, Orion respectfully requests that the Commission revise proposed Rule Section 80.203 as suggested herein.

Respectfully submitted,
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d/b/a ORION TELECOM

By


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